

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

ROUND ROCK RESEARCH, LLC	§ Civil Action No. 4:11-cv-332-RC-ALM
	§
Plaintiff,	§
	§
v.	Jury Trial Requested
	§
	§
ORACLE CORPORATION and DELL INC.	§
	§
	§
Defendants.	§
	§
<hr/> DELL INC.	§
	§
	§
Third-Party Plaintiff,	§
	§
v.	§
	§
	§
MICRON TECHNOLOGY, INC.	§
	§
	§
Third-Party Defendant.	§
	§
	§

ADDENDUM TO STIPULATED PROTECTIVE ORDER

This Addendum applies only to Discovery Materials produced hereafter by Plaintiff Round Rock Research, LLC (“Round Rock”), Defendant and Third-Party Plaintiff Dell Inc. (“Dell”), and Third-Party Defendant Micron Technology, Inc. (“Micron”) (collectively, “the parties”). The parties jointly move for entry of this Addendum to the Stipulated Protective Order Regarding the Disclosure and Use of Discovery Materials pursuant to Rule 26 of the Federal Rules of Civil Procedure, Dkt. 163 (the “Stipulated Protective Order”) in order to expedite discovery pending resolution of the disagreement between Dell and Micron as to whether the four Dell in-house counsel who have access to CONFIDENTIAL ATTORNEYS’ EYES ONLY

materials pursuant to Section 9(b)(ii) of the Stipulated Protective Order should have access to Micron's proprietary financial, technical, or commercially sensitive competitive information.

1. The parties may optionally designate any Discovery Materials produced by and between them that meet the requirements of Section 9(a) of the Stipulated Protective Order as **CONFIDENTIAL OUTSIDE COUNSEL'S EYES ONLY**, instead of **CONFIDENTIAL ATTORNEYS' EYES ONLY**.

2. Any materials, including deposition transcripts, designated by the parties as **CONFIDENTIAL OUTSIDE COUNSEL'S EYES ONLY** shall be subject to the same restrictions set forth in the Stipulated Protective Order for materials designated **CONFIDENTIAL ATTORNEYS' EYES ONLY**, except that the disclosure allowed by Section 9(b)(ii) of the Stipulated Protective Order to identified in-house counsel shall not apply to materials when properly designated as **CONFIDENTIAL OUTSIDE COUNSEL'S EYES ONLY** by any party. All other provisions of Section 9 of the Stipulated Protective Order shall apply to such materials.

3. If Micron and Dell are not able to resolve their disagreement voluntarily, either party may seek from the Court an appropriate modification of the terms of this Addendum.

4. The Stipulated Protective Order is not otherwise modified in any respect.

SIGNED this 3rd day of July, 2012.



AMOS L. MAZZANT
UNITED STATES MAGISTRATE JUDGE